

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA,**

## **Plaintiff and Counter-Defendant,**

and

## WAYNE LAPIERRE,

## **Third-Party Defendant,**

V.

## **ACKERMAN MCQUEEN, INC.,**

## **Defendant and Counter-Plaintiff,**

and

**MERCURY GROUP, INC., HENRY MARTIN, WILLIAM WINKLER, MELANIE MONTGOMERY, AND JESSE GREENBERG,**

## **Defendants.**

**Civil Action No. 3:19-cv-02074-G**

To: All Defendants

C/o: Jay Madrid, Esq.  
Dorsey & Whitney LLP  
300 Crescent Court, Suite 400  
Dallas, Texas 75201

**PLAINTIFF'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

Plaintiff the National Rifle Association (the “NRA”), by counsel and in accordance with Rule 34 of the Federal Rule of Civil Procedure, hereby propounds its First Set of Requests for

# **EXHIBIT B**

24. “**Native data format**” means and refers to the format of ESI in which it was originally generated and/or normally kept by the producing party in the usual course of its business and in its regularly conducted activities.

25. The term “**NRA**” refers to the Plaintiff, the National Rifle Association of America, and includes its officers, directors, employees, principals, attorneys or other persons acting on their behalf, including all successor or predecessor entities.

26. The term “**person**” refers to all natural persons, groups of natural persons acting in a collegial capacity (*e.g.*, a committee or counsel), corporations, partnerships, associations, trusts, joint ventures, and any other incorporated or unincorporated business, governmental, public, or legal entity, including, when applicable, the person’s subsidiaries, controlled persons, controlling persons, shareholders, officers, directors, employees, agents, or other persons acting or purporting to act on its behalf.

27. The term “**refer(s) or relate(s) to**” means concerning, relating to, reflecting, referring to, having a relationship to, pertaining to, identifying, containing, pertinent to, compromising, setting forth, showing, disclosing, describing, explaining, summarizing, evidencing, or constituting, directly or indirectly, in whole or in part, or to be otherwise factually, legally, or logically connected to the subject matter of the particular request.

28. **Time Period.** Unless otherwise noted, the time period covered by these Requests is January 1, 2015, to present.

29. The term “**You**” and “**Your**” refers to each and every Defendant, including any subsidiary, affiliate, joint venture, or other business arrangement, as well as officers, directors, employees, principals, contractors, agents, attorneys or other persons acting on their behalf, including all successor or predecessor entities.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served upon counsel of record in the above cause via email in accordance with the Federal Rules of Civil Procedure and the Local Rules on this 5th day of November 2019.

*/s/ Jason C. McKenney*

Jason C. McKenney (State Bar No. 24070245)

4838-8680-1323.11